



217/782-6760

EPA Region 5 Records Ctr.



304146

Re: Legislative Changes Affecting Nonhazardous Special Waste Manifests and Reports.

June 26, 1991

Dear Environmental Coordinator:

New legislation (Senate Bill 388) has been approved by the House and Senate and is expected to be signed by Governor Edgar. Upon his signature, the law will put into effect the following:

- The four-part Nonhazardous Special Waste Manifest has been eliminated. The six-part Uniform Hazardous Waste Manifest will be used for all special waste, including hazardous and nonhazardous.
- Nonhazardous special waste will continue to be shipped on the six-part manifest; however, the word "hazardous" must be crossed out on the manifest and no manifest copies are to be sent to the Agency.
- Nonhazardous Reporting has been changed. Quarterly Reports are no longer required; instead, waste quantities must be reported to the Agency on the Nonhazardous Annual Report. This annual report must be received at the Agency by February 1 of each year. This report must be completed by all treatment, storage, disposal, and recycling facilities located in Illinois which have received these types of special waste. The report also must be completed by Illinois generators who have sent these types of wastes to locations outside of Illinois.

The Nonhazardous Annual Report describes the activity of the previous calendar year. It is a summation of all manifested nonhazardous and PCB wastes with a shipping date of January 1 through December 31 of each year. The first Nonhazardous Annual Report summarizing the entire calendar year of 1991 must be received at the Agency February 1, 1992.

- Hazardous waste manifesting and reporting will continue to remain the same as currently required. The Agency will continue to receive parts 2 and 5 of the six-part manifest. The Annual RCRA Hazardous Waste Report(s) must be received at the Agency by March 1 of each year and describe hazardous waste management activities for the previous calendar year.

- PCB manifesting and reporting will continue to require submittal of parts 2 and 5 of the manifest to the Agency. PCB waste must also be reported on the Nonhazardous Annual Report.
- Mixed loads consisting of hazardous and nonhazardous waste, when shipped together, can be listed on a single manifest form. However, each type of waste must be included on the appropriate annual report (the Annual RCRA Hazardous Waste Report or the Nonhazardous Annual Report).
- New generators will still be provided a one-time supply of up to twenty manifests at no charge. All subsequent manifests are still \$1.00 each. No generator will be required to pay more than \$500.00 per calendar year for manifests.

Due to this impending change in the law, all orders for Nonhazardous Waste Manifests are being filled with the required six-part Uniform Hazardous Waste Manifests. While the OMB statement on the manifest expires September 30, 1991, the manifest itself does not. There is NO expiration of the current (fee paid, fee exempt, or fee paid if applicable) Uniform Hazardous Waste Manifests. Continue to use these six-part manifest forms.

For questions concerning manifest orders, contact Cindy Nelson at 217/524-6175.

For questions concerning manifest completion, Nonhazardous Annual Reporting, or to order Nonhazardous Annual Reports, contact Karen Hoffman at 217/782-0448.

For questions concerning Annual Hazardous Waste Reporting, contact Dana Curtiss at 217/785-8441.

Please copy and distribute this information to others affected by this change of law to assist them in this transition.

Sincerely,

Bill Radlinski

E. William Radlinski, Manager
Planning and Reporting Section
Division of Land Pollution Control